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(additional counsel listed in Exhibit A)

Local Bankruptcy Counsel to Securities Lead Plaintiff and the Class

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

Case No. 19-30088 (DM) (Lead Case)
Chapter 11
(Jointly Administered)

**PERA'S RESPONSE TO THE COURT'S
MEMORANDA OF MAY 30 AND
SEPTEMBER 18, 2024**

- ☒ Affects Both Debtors
☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company

1 Lead Plaintiff Public Employees Retirement Association of New Mexico (“PERA”) hereby
2 submits this response to the Court’s memoranda of May 30 and September 18, 2024.

3 In its May 30, 2024 memorandum, the Court requested from PERA “a current count
4 (number of claims, not dollar amounts or identification of the claimants) that are included in the
5 33rd Omnibus Objection, including any who opted to align themselves with PERA in addition to
6 the number of claimants identified on Exhibit A to the Stipulation Regarding Motion of Lead
7 Plaintiff Pursuant to B.L.R. 90006-1 to Extend Time to File Response to Certain Claim Objections.
8 (Dkt. 14341-1).” *See* Dkt. 14469.

9 On June 21, 2024, PERA responded that it was then aware of 107 claims that had opted to
10 align themselves with PERA, including those identified on Exhibit A to the Stipulation Regarding
11 Motion of Lead Plaintiff. *See* Dkt. 14497.

12 On September 18, 2024, the Court issued the Memorandum Decision on Thirty-Third and
13 Thirty-Fourth Securities Omnibus Claims Objections, which directed the parties to “submit updated
14 reports concerning unresolved claims filed in their respective June 21, 2024, submissions”
15 Dkt. 14593.

16 PERA responds that it is aware of 184 claims that have opted to align themselves with
17 PERA to date. According to Kroll Restructuring Administration, none of those claims have been
18 resolved by settlement. *See* <https://restructuring.ra.kroll.com/pge>.

19 In addition, PERA intends to seek discovery regarding unresolved claims from the
20 Reorganized Debtors and their claims agent. Such discovery is necessary for PERA to contact those
21 securities claimants with unresolved claims to determine whether they are also interested in aligning
22 themselves with PERA.

23 Dated: October 15, 2024

Respectfully submitted,

24 **LABATON KELLER SUCHAROW LLP**

25 By: /s/ Michael P. Canty
26 Michael P. Canty (*pro hac vice*)
27 Lead Counsel to Securities
Lead Plaintiff and the Class

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- and -

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Liaison Counsel for the Class

- and -

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- and -

**VANOVERBEKE, MICHAUD &
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EXHIBIT A

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